

Written testimony for Senate Bill 0516 Favorable with Amendments

Dear Senators Feldman, Hayes and Mr. Will Tillburg,

I am the owner of Fingerboard Farm, an agritourism farm- stay, located in Frederick County Maryland. My business encompasses research and development of sustainable agriculture focusing on carbon sequestration, healthy soil building through green waste reversal technology. My Federal, State and Frederick County Innovation projects and grants are based on Hemp cultivation and post extract of solventless hemp plant material that is used to create carbon biochar. My efforts have been awarded from Frederick Economic Development as a top 50 business in Frederick County in innovation. I am a fifth year Hemp FarmHer, a woman owned vertically integrated cultivation, extraction/formulation and farm market sales business. My CBD and Hemp Flower products are sold in six Maryland Medical Marijuana Dispensaries. My flower has been extracted and used as a CBD ingredient for a Maryland based Multi-State Cannabis Corporation. My flower has been extensively tested for potentially dangerous contaminants such as heavy metals, non organic chemicals, mycotoxins, microbials and residual solvents, all passing at the medical grade acceptable amounts. My focus is on cultivation of the cannabis sativa plant and creating plant based naturally occurring products from cannabinoids that did not exceed .3 THC limit. My products are not intoxicating and are not created in a pharmaceutical process that uses acetate.

It is imperative that scientific research continues and is required to expound our understanding of the human endo-cannabinoid system. The banning of full spectrum hemp derived will put an end to my business and all Maryland Hemp Farms. We do not have equipment to isolate CBD and remove the THC, we do however have the ability to grow CBD using genetics that are low in THC and high in CBD. We must be able use full spectrum naturally occurring hemp derived minor and major cannabinoids for the industry to continue. It is my position that the future of Hemp, Medical and Adult Use cannabis products do not allow for any acetate in the formulation of any products manufactured and sold in the State of Maryland.

I publish a growing 2,000 person Hemp/CBD blog newsletter. I've formulated a wide selection of CBD and hemp derived products found on my e-commerce website www.fingerboardfarm.market It's crucial that I am able to grow, extract, produce, sell as well as purchase from other manufacturers, all forms of products in any size container that do not exceed the Federal or State limit of .3% THC. I request that any extract sold in Maryland from my legal flower that has been approved by a DEA certified agent and issued a Certificate of Analysis to PASS, is approved for sale in any form for human consumption in any size container, as long as it is within the proposed request to not allow for the chemical process of using acetate to compound and formulate the end product and is below the federally legal .3% THC. This is the solution to remove chemically compounded synthetic products.

I am filling a very important need for many people who don't want to get high, but want the benefits of full extract cannabis at a percent that is non intoxicating. I have personally invested over \$200,000 into building my Hemp business and continue to reinvest proceeds back into my sustainable agriculture farm. My mission to heal the earth and humankind one hemp plant at a time began with my personal health crisis. All products that I sell, I personally consume, test and recommend to others to fit their specific need or their request to stock in my store. The stigma about Cannabis is slowly fading and now should be a free market with the demand coming from the consumer. It is not possible for my business to continue operation unless I can continue as I have over the last five years. It is crucial for my farm to be able to operate as we have, legally and with passion for top quality flower and products.

My deep concerns about the proposed language in the Cannabis Reform Act, it aims to lower the acceptable Delta-9-Tetrahydrocannabinol concentration below the federally threshold and placing a cap on THC at 0.5mg per serving and 2.5mg per package for those without a recreational or Medical dispensary cannabis license. This language is not only misleading but it would render hundreds of products that are currently protected under federal law illegal. As written, this bill would have a devastating impact on the hemp industry in Maryland and would result in the closure of hundreds of family-owned, small, and minority owned businesses like mine. It would destroy an industry overnight without any input from industry participants. The Hemp Industry in Maryland has worked hard to create common sense regulations for these types of products in accordance with the recommendations from the Maryland Medical Cannabis Commission's study group that was formed last year to study these products specifically. We stand ready to support amendments that would protect public safety as well as the industry's ability to participate in the free market. We want regulation, but we do not want to lose our businesses which are protected by federal law due to the implementation of the recreational cannabis industry. A collaborative effort between the hemp and cannabis industry can and should exist as that is what is best for our industry as well as what is best for the consumers of these products.

In addition, the proposed cap on THC at 0.5mg per serving and 2.5mg per package without a legal cannabis license will make it impossible for small hemp businesses to comply. This legislation would have a profound impact on the hemp industry in Maryland and would result in the closure of hundreds of small family-owned businesses of which over 30% are minority owned. There is already a real climate of social equity in the hemp industry that would be eradicated by this original language as written. The proposed THC cap, in particular, would render all hemp full-spectrum CBD products illegal, despite their federally legal status and widespread consumer use. Currently these products are even being sold in grocery stores and pharmacies across the state.

Establishing limits like these on any products containing cannabinoids should be based on science. Given the past prohibition of hemp and cannabis in general, we lack the important research needed to make these science-based determinations. Making these determinations at this point would be pure speculation. Full-spectrum CBD products contain trace amounts of THC, below 0.3%, which is considered to be within the legal limit under federal law. However, this proposed cap of 0.5mg per serving and 2.5mg per package would effectively move the threshold to 0.05% and make these products significantly less effective and illegal, removing them from the free market and limiting consumer choice by forcing consumers to buy them from an adult use cannabis facility as opposed to a CBD specialty store, pharmacy, or grocery store.

The fact that these adult-use cannabis licenses will not be available until next year only adds to the hardship faced by our small businesses. This bill would not only shut down many businesses, but it would also remove their ability to build the capital needed to get involved in the adult-use cannabis industry which would be required in order to continue offering these products in accordance with the law. This language as written would force hemp businesses to participate in an industry that many of them do not want to participate in. The hemp industry plans to stay in business during and through the implementation of recreational cannabis. The launch of Adult-Use Cannabis will not render us an obsolete industry as our customer base is much different from the traditional marijuana user. We plan on being here to stay.

Furthermore, this legislation would criminalize a federally legal industry while legalizing a federally illegal one, making it an ill-advised approach to the issue. This language would further consolidate the cannabis industry and destroy the small business community in the hemp industry which I'm sure is not the intention of the legislature. We ask that language which aims to place a cap on THC at 0.5mg per serving and 2.5mg per package for those without a recreational cannabis license be amended to mirror the federal law which limits these products to 0.3% of Delta 9 THC on a dry weight basis. This amendment will ensure that the hemp industry in Maryland can continue to thrive and not be placed at a disadvantage when compared to other states. Please do not kill our industry that we worked so hard to build. The intent and goals behind the implementation of the recreational cannabis industry would still be accomplished without the need to crush our industry in the process.

I urge you to reconsider the language in this bill and to consult with the industry before enacting legislation that would have such a damaging impact on small and minority-owned businesses.

Sincerely,

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